

EXHIBIT O

From: Barbara Wells <barbara@raffaconsulting.com>
Subject: RE: Laribee v. Gypsum (Raffa Production)
Date: March 13, 2023 at 6:40:39 PM EDT
To: Edward Cook <ecook@cookpclaw.com>
Cc: Lindsey Rodgers <lrogers@cookpclaw.com>, Robert Underwood
<runderwood@cookpclaw.com>

<https://www.dropbox.com/t/IUCCT1gQefrgOL2O>

Thank you,
Barbara Wells
Raffa Consulting Economists, Inc.
phone - 407.648.5141
fax - 407.649.8601
e-mail - barbara@raffaconsulting.com

Due to the recent restrictions arising as a result of COVID-19 (Coronavirus), we respectfully request that you send any documentation/correspondence electronically via email instead of via snail mail or fax, if you are able.

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From: Edward Cook <ecook@cookpclaw.com>
Sent: Monday, March 13, 2023 6:28 PM
To: Barbara Wells <barbara@raffaconsulting.com>
Cc: Lindsey Rodgers <lrogers@cookpclaw.com>; Robert Underwood <runderwood@cookpclaw.com>
Subject: Re: Laribee v. Gypsum (Raffa Production)

Ms. Wells: I did check my email again and I also checked my Junk folder and there was no email or dropbox link from you. Please send me the link as immediately as possible. Please identify any

and all documents that were removed from the link after the link was provided to Mr. Viggiani.

Thank you,

Edward S. Cook
Attorney
ecook@cookpclaw.com
COOK, pc
970 Peachtree Industrial Blvd
Suite 202
Suwanee, GA 30024
Phone: (404) 841-8485
Fax: (678) 541-5408

www.cookpclaw.com

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In addition, please forward the message back to the sender and delete it from your system. Thank you.

On Mar 13, 2023, at 6:12 PM, Barbara Wells
<barbara@raffaconsulting.com> wrote:

Mr. Cook,
I sent it to Dr. Raffa and Mr. Viggiani. Dr. Raffa received it at

4:57pm. I will check and see when Mr. Viggiani received his link. Maybe you had left the office 3 minutes before it arrived. If for some reason you did not receive it, please let me know and I will send another link.

Thank you,
Barbara Wells
Raffa Consulting Economists, Inc.
phone - 407.648.5141
fax - 407.649.8601
e-mail - barbara@raffaconsulting.com

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From: Edward Cook <ecook@cookpclaw.com>
Sent: Monday, March 13, 2023 5:54 PM
To: Barbara Wells <barbara@raffaconsulting.com>
Cc: Lindsey Rodgers <lrogers@cookpclaw.com>; Robert Underwood <runderwood@cookpclaw.com>
Subject: Re: Laribee v. Gypsum (Raffa Production)

Ms. Wells:

Thank you for the below response. Please be advised that I have not received any dropbox link as of the writing of this email. It is the end of the day and I am leaving the office headed home for dinner and I just wanted to make my record. I don't know if this was an oversight or if it is still forthcoming. I look forward to receiving the dropbox materials via the link as soon as possible.

Have a nice evening.

Edward S. Cook
Attorney
ecook@cookpclaw.com
COOK, pc
970 Peachtree Industrial Blvd
Suite 202
Suwanee, GA 30024
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In addition, please forward the message back to the sender and delete it from your system. Thank you.

On Mar 13, 2023, at 4:52 PM, Barbara Wells
<barbara@raffaconsulting.com> wrote:

Mr. Cook,

We received a subpoena for Frederick A. Raffa, Ph.D. for records in the above matter. Records for Raffa Consulting Economists, Inc. would be the same records. I am not an attorney, I am the

records custodian. I have included all records (per the emails even though they are not part of our paper file). I will be sending these records by dropbox.

1. Contained in File Contents
2. File Contents Attached
3. Contained in File Contents
4. Contained in File Contents
5. Contained in File Contents
6. Contained in File Contents
7. Contained in File Contents
8. Contained in File Contents
9. Curriculum Vitae Attached
10. Contained In File Contents
11. Contained in File Contents
12. Attached
13. Attached
14. Dr. Raffa's testimony has never been limited by any Court
15. Contained in File Contents
16. Dr. Raffa does not keep such records

Thank you,
Barbara Wells
Raffa Consulting Economists, Inc.
phone - 407.648.5141
fax - 407.649.8601
e-mail - barbara@raffaconsulting.com

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From: Edward Cook <ecook@cookpclaw.com>
Sent: Monday, March 13, 2023 2:30 PM
To: Barbara Wells <barbara@raffaconsulting.com>
Cc: Lindsey Rodgers <lrodgers@cookpclaw.com>; Robert Underwood <runderwood@cookpclaw.com>
Subject: Re: Laribee v. Gypsum (Raffa Production)

Dear Ms. Wells:

I received the below email and appreciate same.

I am writing to you as I understand you to be the person (and only person) that has responded to the federal court subpoena(s) that was properly issued and properly served upon Raffa Consulting Economists, Inc. and Frederick A. Raffa. I have a documented service date of February 24, 2023 for subpoenas to Raffa Consulting Economists, Inc. and/or for Frederick A. Raffa. Please advise if your response to the subpoenas' provided are for the corporation Raffa Consulting Economists, Inc. and/or for Frederick A. Raffa personally? There was no indication if the responses provided were for the corporate practice entity or for the individual.

It is also my understanding that you are not an attorney. If I am mistaken, please so advise.

I did notice that on a few of the documents there was one page provided (sometimes not in sequence) and the remaining email chain and/or document was not included and not provided. I understand that you provided a lump production and failed to account for which item number in the subpoena(s) (i.e. 1-16) to which the document or response may apply.

Further, I did not receive nor was I provided any privilege log and/or list of any documents that were withheld from production. Please produce a complete privilege log and/or list of documents that were withheld from production for any reason whatsoever. Any failed production will be brought to the court's attention via motion.

Please be advised that I will be filing a motion to compel for non-compliance. I would ask that you provide any remaining documents and/or materials and/or privilege log or list to my attention as immediately as possible in an effort to prevent me from having to involve the court.

I look forward to hearing from you.

Thank you.

Edward S. Cook
Attorney
ecook@cookpclaw.com
COOK, pc
970 Peachtree Industrial Blvd
Suite 202
Suwanee, GA 30024
Phone: (404) 841-8485
Fax: (678) 541-5408

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On Mar 13, 2023, at 1:29 PM, Barbara Wells
<barbara@raffaconsulting.com> wrote:

Attached please find the documents you requested.

Thank you,
Barbara Wells
Raffa Consulting Economists, Inc.
phone - 407.648.5141
fax - 407.649.8601
e-mail - barbara@raffaconsulting.com

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<Laribee v. Gypsum File Contents.pdf><FRED.Resume
(Revised).pdf><3-8-23 Raffa Rule 26 Listing.pdf>

<FRED.Resume (Revised).pdf><3-8-23 Raffa Rule 26 Listing.pdf>